

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

OPTIS WIRELESS TECHNOLOGY, LLC,
OPTIS CELLULAR TECHNOLOGY, LLC,
UNWIRED PLANET, LLC, UNWIRED
PLANET INTERNATIONAL LIMITED, AND
PANOPTIS PATENT MANAGEMENT, LLC,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Civil Action No. 2:19-cv-66-JRG

JURY TRIAL

Honorable Rodney Gilstrap

**JOINT MOTION TO ENTER STIPULATED ORDER
ON EXECUTION OF JUDGMENT AGAINST DEFENDANT**

Plaintiffs Optis Wireless Technology, LLC, Optis Cellular Technology, LLC, Unwired Planet, LLC, Unwired Planet International Limited, and PanOptis Patent Management, LLC (collectively, “PanOptis”) and Defendant Apple Inc. (“Apple”) have agreed and jointly move the Court to enter an order as follows:

- A. PanOptis is the prevailing party in this matter.
- B. Apple will not be required to post bond or other security pending appeal. PanOptis has agreed to accept the verification of Exhibit A to this Stipulated Order as sufficient evidence of Apple’s present ability to satisfy any Judgment in this matter entered on February 25, 2021 (“Judgment in this matter” or “Judgment”).
- C. Apple further agrees (i) to provide updated verifications, in the form of Exhibit B hereto, to PanOptis on a quarterly basis, confirming Apple’s continuing ability to satisfy the

Judgment in this matter and (ii) to report to PanOptis, in the form of Exhibit C hereto, within seven days of Apple's determination that its ability to satisfy the Judgment in this matter is compromised.

D. Apple agrees that, as provided in Exhibit A, it will pay any payment then due under the Judgment within 30 days after the Judgment becomes final, unappealable, and no longer subject to review in the Supreme Court of the United States by petition for writ of certiorari.

E. In reliance on the certification of Exhibit A and Apple's obligations in paragraphs C and D immediately above, PanOptis agree that they will not execute before 30 days after the completion of proceedings provided as in paragraph D.

F. Any party may move the Court for modification, failing agreement between the parties on such modification, under any circumstances which that party deems sufficient to justify modification.

Signed and agreed as to form and content:

Date: March 9, 2021

Respectfully submitted,

/s/ Samuel F. Baxter

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 9th day of March 2021.

/s/ Melissa R. Smith

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiffs and counsel for Defendant have complied with the meet and confer requirement in Local Rule CV -7(h) regarding this Motion. The Parties are in agreement and are seeking joint relief.

/s/ Melissa R. Smith